

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE**

ALBERTA LOUISE PERRY, surviving spouse  
and next kin of VINCENT MCKINNEY,  
deceased,

Plaintiff,

v.

No. 3:21-cv-00414-KAC-JEM  
JURY DEMAND

JENKINS & STILES, LLC and NCI  
GROUP, INC. d/b/a METL-SPAN,

Defendants.

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**PLAINTIFF'S NOTICE OF FILING SUPPLEMENTAL AUTHORITY**

Plaintiff, Alberta Louise Perry, surviving spouse and next kin of Vincent McKinney, deceased, by and through her undersigned counsel, and gives notice of filing supplemental authority as follows:

1. *McQueen v. Green*, 2022 IL 126666 (IL April 21<sup>st</sup>, 2022) (holding an employer's acknowledgement of vicarious liability for its employee's conduct does not bar a plaintiff from raising a direct negligence claim against the employer).

Respectfully submitted,

**THE LAW FIRM FOR TRUCK SAFETY, LLP**

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*Attorney for Plaintiff, Alberta Louise Perry  
next kin and surviving spouse of  
Vincent McKinney, deceased*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via the  
Court's ECF filing system to the following:

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on May 16<sup>th</sup>, 2022.

/s/Matthew E. Wright  
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